

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE  
COMPANY,

Defendant.

VIRTAMOVE, CORP.,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES  
CORP.,

Defendant.

Case No. 2:24-cv-00093-JRG

**(LEAD CASE)**

**JURY TRIAL DEMANDED**

Case No. 2:24-cv-00064-JRG

(Member case)

**JURY TRIAL DEMANDED**

**JOINT MOTION FOR SECOND AMENDED DOCKET CONTROL ORDER**

Plaintiff VirtaMove, Corp. (“VirtaMove”) and Defendants Hewlett Packard Enterprise Company (“HPE”) and International Business Machines Corp. (“IBM”) (collectively, “the Parties”) jointly and respectfully request that the Court amend its First Docket Control Order (Dkt. No. 76) as reflected below in the Second Amended Docket Control attached hereto.

<b>Original Deadline</b>	<b>New Deadline</b>	<b>Event</b>
Friday, November 22, 2024	<b>Tuesday, December 3, 2024</b>	Comply with P.R. 4-1 (Exchange Proposed Claim Terms)
Monday, October 21, 2024	<b>Wednesday, October 30, 2024</b>	Defendants and Counter-Defendant Comply with P.R. 3-3 (Invalidity Contentions) & 3-4(b)(production of prior art and translations).

Counsel for HPE and IBM met and conferred with counsel for VirtaMove to discuss the extension of the deadline requested in this Motion. The Parties are jointly seeking the relief sought herein.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion and enter the proposed order attached hereto.

Dated: October 18, 2024

By: /s/ Jennifer H. Doan

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*Attorneys for Plaintiff VirtaMove, Corp.*

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for HPE and IBM met and conferred with counsel for VirtaMove to discuss the substantive issues addressed in this Motion pursuant to Local Rule CV-7(h). The Parties are jointly seeking the relief sought in this Motion.

By: */s/ Reza Mirzaie*  
Reza Mirzaie

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing is being served on all counsel of record who consent to electronic service on October 18, 2024.

By: */s/ Reza Mirzaie*  
Reza Mirzaie